

Overall

- Require all State & Local governments impacted by the proposed wind power plant to implement a State Environmental Quality Review (SEQR) process which enforces transparency to the public and the relevant State agencies to be involved and have decision making power throughout the process.
- US Commission on Ocean Policy Report and the Pew Oceans Commission reports over the last few years invested millions of taxpayer dollars to conduct extensive reviews of the state of our ocean environment. Both of these reports provided important action items that should be addressed prior to any MMS EIS moving forward.
- NYS Article 10 of the Public Service Law expired and should be reinstated to ensure all agencies are involved with the review of this project from a need and environmental perspective.

Project Approval Process

- Stop the fast tracking of LIPA's Offshore Wind Power Plant project. Big Energy companies that pay lobbyists and their political machine to obtain approvals for a project of this kind is criminal. There should not be a separate Environmental Impact Statement (EIS) for LIPA's project. LIPA should be subject to the National Programmatic EIS process. Long Islanders deserve the benefits of this more comprehensive environmental approach.
- Stop the political activism and corruption that is surrounding this project and focus on the facts. This offshore wind power plant will NOT stop alleged global warming, NOT improve our air quality and NOT reduce our reliance on foreign fuel. These false claims cannot be listed as benefits or justifications for this project. This is merely "feel good propaganda" touted by LIPA and their environmental cronies (who receive grants from LIPA and the wind energy) to generate a false perception that we must do this project quickly to be "green" and "save the world". The fact is that this project will create more environmental issues for Long Island and not address our energy needs. The only thing green about LIPA's offshore wind power plant is the cash going into these organization's pockets from the subsidies and payoffs from the wind industry.
- Require the applicant to provide a full listing of all of the various permits (federal, state, county and local) that it will need in order to proceed. This list should include timeframes and current status of each individual permit action.
- Local governments must be given decision making authority when public open space is being taken and used by private companies

Project Justification

- Require applicant to demonstrate true need of implementing this project. LIPA is pushing to expedite this industrial power plant so they can collect lucrative government subsidies before they expire. This power plant is not needed: LIPA has no plans to build any other offshore wind power plants; at best it will generate a maximum of 140MW which equates to 1% of LI's energy - only if the wind blows in a specific range. Cleaner, greener alternatives that cost less than the wind power plant and will generate more than the 140MW: repowering one single existing plant, have each household put in 6 fluorescent bulbs, expand the Solar Program at SUNY Farmingdale.
- LIPA has no idea what this project will truly cost but their estimates have ranged from \$400 million to just under \$1 billion. LIPA should be required to provide a full range of energy alternatives including repowering a single existing power plant which they estimate to cost approximately \$200 million and will guarantee 520MW and reduce a plant's air pollution by 90% (Newsday, 8/9)

- Full NEPA compliance including a full range of alternatives and a cost benefit analysis that incorporates all economic aspects of this proposal (i.e. commercial and recreational fisheries, maritime trade, tourism, property values, etc.) and not just the benefits or siting of the entire wind plant proposal.
- Require applicant to justify the destruction of Long Island's public beaches and coastlines - taking 60 years of taxpayer dollars used to preserve, protect and maintain the Jones Beach Barrier Island and surrounding Atlantic Ocean beaches and throw it out the window so that a Big Energy company can now exploit the area for their financial gain. An area which includes multiple undeveloped sanctuaries that are home to a variety of migratory birds and native plants, the Theodore Roosevelt Nature Center, John F. Kennedy Wildlife Sanctuary occupying about 550 acres and has a large pond, maritime thickets, marshes and bay shores and South Shore Estuary.
- The infrastructure implemented for LIPA's wind power plant will only be able to support a maximum of 140MW at best which equates to 1% of LI's energy needs (best case). However, facts from Europe prove that these wind power plants operate well below expectations. For example: When the 30-turbine Scroby Sands wind power plant was built off the Yarmouth coast in 2004 it was hailed as the beginning of a modern, safe, clean and fertile era of energy production. But the government's first annual report into the £67m development paints a very different picture - with the turbines generating only 28.9pc of the power they were meant to. A spokesman for owners E.ON UK said that the renewable energy sector was in its infancy and that lessons would be learned from the problems at Scroby. Given E.ON's assertion that the windfarm could produce enough electricity to power 41,000 homes, the figures show that during 2005 fewer than 12,000 properties were actually powered by Scroby.
-

Siting of the Offshore Power Plant

- Require applicants to explain in full and clear detail how and why the turbine locations were selected and what avoidance and minimization measures are incorporated into the project design to avoid or reduce fish and wildlife impacts.
- Require applicants to provide alternative wind power plant siting options – both on and offshore. For example, LIPA has attempted to operate 3-5 turbines that were erected on their power plant property. Once they get them working, they can expand these onshore turbine plants and generate more energy than the offshore wind plant.
- Require multi-year site specific studies be undertaken to document resources that may be affected by the power plant including the turbines, substation(s), transmission cables from its oceanic connection terminal to its final destination on land.
- Require applicants to provide clear justification, through environmental analysis, for their choice of the cable route and to explain why they have not explored other feasible routes such as usage of the Wantagh Causeway.
- The landward portion of the applicant's proposal shows the cable running underneath Clock Boulevard in Massapequa and terminating at the Sterling substation. The community living along this corridor is a moderate to low-income community and are afforded the rights of the due process of the Civil Rights Act. For this reason, require that the Civil Rights Act be made a part of this NEPA process.

Avian & Marine Environmental Impacts

- Require that MMS hold the permit application in abeyance until the applicants erect a jack up barge platform in the proposed area and conduct radar surveys for winged species passing through this region for three years prior to any start up. Require specifically that three years of preconstruction studies be completed using a combination of radar(horizontal and vertical), acoustic, direct field sampling, and visual observation be employed. Require that the remote sensing (radar & acoustic) should be operated continually 365 days of the year.

- Require that applicants provide full descriptions of how the applicants intend to avoid avian electrocutions, serving as perching areas, and lighting schemes for all structures.
- Require that formal consultations under Section 7 of the Endangered Species Act for all federally listed threatened and endangered species occurring in this region be undertaken and incorporated into the DEIS.
- Require that applicants evaluate the potential effects of the proposed project on all significant habitats in the area and that applicants provide the results in the DEIS.
- Long Island's shore is perpendicular to the direction of migrations, not parallel like other East Coast areas. Site specific studies must be undertaken by LIPA and involve local scientists and the public to ensure fairness and validity of results.

Human Environmental Impacts

- On LIPA's website, they note an "interim" report published by PW Grosser Corporation in August 2005 that states "no potential impacts are expected" to the aquifers that supply drinking water to LI residents. However, if the turbine generators were to penetrate the aquifer, "no significant adverse impacts would be expected". Protecting lands that drain into the South Shore Estuary Reserve is critical in protecting LI's water quality. Based on this one potential impact alone, this project should be stopped immediately. It is not worth the risk to our water supply.
- Require applicants to complete a navigation risk assessment of the proposals potential impact on navigational and aviation safety, search and rescue operations, communications, radar, and positioning systems.
- NEPA requires that all direct, secondary and cumulative impacts of all recent past, present, and future foreseeable actions be included in the assessment. To accomplish, require applicants to use a full ecosystem and multi-ecosystem approach to the task at hand.
- Require that accurate assessments of ensuing essential fish habitat (EFH) damage, pursuant to the Magnuson-Stevens Fisheries Conservation Management Act, be incorporated into the DEIS. This will not only include the direct impacts but indirect and cumulative as well.
- Before one cable is buried on or offshore, extensive studies should be completed for potential impacts, both short and long term – to not only marine life but human life ! How will these 28 miles of cabling be maintained and monitored to ensure there are no Electro Magnetic Fields today or tomorrow ?
- Important coastal zone implications, such as conflicts with traditional use and economic dependency with respect to the siting of this proposal, must be addressed in the DEIS.
- Sewer outfall pipes from Cedar Creek and Bergen Point terminate inside the proposed site however LIPA "does not expect the wind power plant machinery to interrupt the flushing action". LIPA must provide a detailed analysis/study to be reviewed by federal and local officials/scientists to ensure accuracy and validity that this will not occur.

Pollution

- In a recent townhall (MHS, 1/17/06), LIPA's Kessel stated that in Asia, an offshore wind turbine's blade malfunctioned in a category 2 hurricane. LIPA should be required to provide detailed documentation on how they would handle a major natural disaster, how the turbines would withstand a storm, etc.
- Lightning destroys many towers by causing the blade coatings to peel off, rendering them useless. If the blades keep spinning, the imbalance can bring down the whole tower. The towers are subject to metal fatigue and the resin blades are easily damaged even by wind. In Europe, parts and whole blades have torn off because of high winds, malfunction and fire. Whole towers have collapsed in Germany and the US. LIPA must provide detailed documentation and proof that the equipment they have selected for their project will not be subject to this damage.
- LIPA must provide details on how routine maintenance/repairs will be handled (impact to recreation and normal traffic) and controlled (dumping of broken equipment, retrieving equipment that has broken apart at sea, industrial

spills/leaks from the substation(s) or turbines). Since these power plants require constant maintenance, our ocean and coastline will have constant machinery parading in/out and turn our beach & ocean into industrial wastelands. Facts from a EDP24 report (8/13/06) from the European Department of Trade and Industry inspectors shows that the Scroby Sands wind power plant off the Yarmouth coast was riddled with mechanical problems which significantly lowered production. Between January and December last year 27 intermediate speed and 12 high speed gearbox bearings needed replacing, along with four generators. The report states that after extensive investigation "work is now at hand to resolve these issues" but that they had "serious implications for resources, costs and downtime".

- LIPA must provide a detailed, scientific, fact based plan for decommissioning the power plant and returning the site to its original state. This process will take many years but the cost must be covered by LIPA and the plan realistic and complete.
-

Noise Pollution

- Per Christopher Clark, a Cornell bioacoustics scientist, based on volume of traffic alone, we know the North Atlantic and North Pacific oceans are the busiest and the noisiest. Hearing is the primary sense for marine life, which uses sound for navigation and communication. Some scientists believe the spreading "acoustic smog" is essentially blinding marine life, affecting feeding, breeding and other crucial activities. Researchers suspect that dumping a cacophony of new noise and vibrations into this system isn't good. Southall said there's convincing evidence of a phenomenon called "masking," in which the increased ambient noise drowns out natural ocean communications. (AP, 4/2005)
- On LIPA and LIOWI's websites, it states that the turbines will not be heard from anywhere on land. However, in a recent town hall (1/17/06), LIPA stated that they could not answer questions regarding noise pollution from the plant and that it was an area of further study. Common sense tells you that you will hear significant noise from a plant this massive.
- Each turbine will also be equipped with foghorns & aviation warning lights affecting the illumination of the night sky. LIPA must conduct a detailed study to determine the effects of these unnatural noises and lights in the current pristine environment. They must also provide a separate study detailing the effects to boats, airplanes since the proposed site is in one of the busiest recreational and traffic areas in the world
- Require LIPA to conduct a multi-year site specific study in conjunction with federal and local scientists to determine the impacts of low frequency noise & vibrations on marine life including endangered species such as the whales as well as onshore animals including humans and family pets

Coastal/Ocean Environmental Impacts

- Only peer reviewed technical literature and ready for staff and public review should be included in the DEIS. Internal industry reports may be included but should not be the basis used in this decision making process. These internal documents should also clarify how the circumstances described in the citation compare with the proposed project.
- Require the project proponent to address environmental impacts that would accrue in all construction and lay down areas to ensure that sediment contours are restored to their preconstruction elevations and stabilized so they can be expeditiously recolonized.
- Require a wetland and aquatic bed survey and developed strategy to ensure that existing values and functions of littoral habitats are maintained.

- Require a detailed analysis of the potential for thermal loading and electromagnetic fields associated with this entire proposal of the adverse effects that would result and an explanation of how they will avoid these impacts.
- Require a sediment transport model data that forecasts erosional patterns and processes under normal and significant storm events for all seasons.
- Require a full cumulative impact analysis regarding cultural and natural resources that fully considers the impacts to the viewshed.
- Require an analysis of credible storm strikes on the integrity of the proposed projects structures.
- Require that LIPA's Master Energy Plan appear in the DEIS.
- Require the applicants to provide their plans for offshore oil and fuel spill discharges and publish results in DEIS.
- The State of New Jersey's Coastal Zone Management Office must be consulted and kept apprised of all developments. This project will impact New Jersey's ports, shipping traffic, fisheries, tourism, land traffic, and numerous other adjacent issues including the City of Bayonne being used as the staging and lay down area for this proposal.
- DEIS should include a full discussion of how this means of creating electricity will lead to the diminished use of fossil fuels.
- Require applicants to assess any possible effects on beach morphology that might occur along all shorelines within 25 miles of the project due to changes in wave patterns resulting from wave refraction around the facility's structures.

Public Open Spaces

- Require that applicants assess fully all possible cultural and economic costs regionally and nation-wide that might result over 30 years from similar projects being located adjacent to both coastal and interior state and national parks, should construction of this facility establish a cultural or legal precedent whereby parklands will no longer be protected from adjacent industrial site.
- Require that applicants determine the economic costs of potential lost revenues to affected municipal, state, and national parks and adjacent communities over the next thirty years should people reduce the number of visits made to affected parks and their adjacent communities due to potential visual and auditory pollution in the parks from this facility.
- Require applicants to assess the likely cost, in terms of psychological stress and potential associated health care costs, on all residents living within one hour from all impacted beaches, that may result from the project's destruction of the view shed of an internationally known oceanfront state park that people have enjoyed for 60 years.

National Security

- This past March, U.S. leaders were briefed by a representative from the UK's Ministry of Defense about the effects of wind turbines on their radar. Among the participants during that meeting were the FAA, various military branches and the Department of Interior. Studies conducted by the British military last year found that turbine blades can produce 'hole(s) in detection' in air defense radar systems, at times causing aircraft to become obscured from view. New York cannot take any chance that our security may be compromised. The current site is in direct flight paths for three major international airports and less than 30 miles from New York City. The proposed site for this power plant should be moved at least 50 miles from an airport.